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SEP. 25 2013

MEM

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

CHARLES R. DIARD, JR.
CLERK

UNITED STATES OF AMERICA

v.

CHRISTOPHER CHANCE COLLIER,
TONYA RENEE COLLIER,
HARVEY EUGENE COLLIER, III,
SIMON JONATHAN WILLIAMS,
WAYNE ERIC COLLIER, JR.
BOBBY W. RODGERS, and
MICHAEL THOMAS STEINER

Criminal No. 13-00219-KD
USAO No. 13R00391

VIOLATIONS:
18 USC § 1029(a)(2)
18 USC § 1341

INDICTMENT

THE GRAND JURY CHARGES:

PREAMBLE

At all times material to this Indictment:

1. As a result of the fire, explosion and release of oil from the Deepwater Horizon oil rig in the Gulf of Mexico on or about April 20, 2010, the National Pollution Fund Center (NPFC) of the U.S. Coast Guard, issued a letter of designation to BP Exploration (BP) designating them as a Responsible Party under the Oil Pollution Act of 1990 (OPA) and advising them of the requirements under OPA to advertise for and receive claims as a result of the incident. BP Exploration accepted this designation acknowledging the requirement to advertise for and receive claims in writing on or about May 3, 2010.

2. Subsequently, the NPFC was notified that starting on August 23, 2010, the Gulf Coast Claims Facility (GCCF) would begin receiving and processing all claims by individuals and business impacted by the Deepwater Horizon spill.

3. In or about June 2010, BP established the GCCF for the purpose of administering, processing, and settling certain claims of individuals and businesses for costs, damages, and other losses incurred as a result of the Deepwater Horizon incident. The GCCF was administered by a fund administrator responsible for decisions relating to the administration, processing, and payment of claims by the GCCF. On or about August 23, 2010, the GCCF began receiving and processing such claims due to the Deepwater Horizon incident.

4. On August 6, 2010, BP established the Deepwater Horizon Oil Spill Trust, an irrevocable common law trust formed under Delaware law, to receive and to distribute funds that BP promised to provide for the payment of certain types of claims, costs, and expenses, including, but not limited to, those resolved by the GCCF.

5. To seek payment from the GCCF for damages incurred a result of the oil spill, an individual or business is required to complete a GCCF Claim Form. The individual or business may submit the form through the internet, by visiting the GCCF website, in person at a GCCF Claims Site Office, by fax, or by mail through the United States Postal Service addressed to the GCCF Claim Facility in Dublin, Ohio. As part of the claim application, the individual or business seeking payment for damages must elect to receive payment by wire transfer directly into the claimant's bank account (or account of the counsel) or by check.

COUNT ONE

From or about March 13, 2010 through on or about March 13, 2011, in the Southern District of Alabama, Southern Division, and elsewhere, the defendant,

CHRISTOPHER CHANCE COLLIER

did knowingly and with intent to defraud, obtain and use an unauthorized access device, which was obtained with the intent to defraud, more specifically GCCF claim number 1051141, such access device was the means by which the defendant accessed his claim for lost wages in the wake of the Deepwater Horizon incident and by such conduct did obtain items of value aggregating more than \$1,000.00 which acts did affect interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(2).

COUNT TWO

From on or about March 13, 2010 to on or about March 13, 2011, in the Southern District of Alabama, Southern Division, and elsewhere, the defendant,

CHRISTOPHER CHANCE COLLIER

willfully and knowingly devised and intended to devise a scheme and artifice to defraud The Deepwater Horizon Oil Spill Trust, and for obtaining money from The Deepwater Horizon Oil Spill Trust by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice to defraud and for obtaining money, caused a bank check to be delivered by mail and commercial delivery service to the Southern District of Alabama.

In violation of Title 18, United States Code, Section 1341 and 2.

COUNT THREE

From or about May 2, 2010 through on or about May 2, 2011, in the Southern District of Alabama, Southern Division, and elsewhere, the defendant,

HARVEY EUGENE COLLIER, III

did knowingly and with intent to defraud, obtain and use an unauthorized access device, which was obtained with the intent to defraud, more specifically GCCF claim number 1062246, such access device was the means by which the defendant accessed his claim for lost wages in the wake of the Deepwater Horizon incident and by such conduct did obtain items of value aggregating more than \$1,000.00 which acts did affect interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(2).

COUNT FOUR

From on or about May 2, 2010 to on or about May 2, 2011, in the Southern District of Alabama, Southern Division, and elsewhere, the defendant,

HARVEY EUGENE COLLIER, III

willfully and knowingly devised and intended to devise a scheme and artifice to defraud The Deepwater Horizon Oil Spill Trust, and for obtaining money from The Deepwater Horizon Oil Spill Trust by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice to defraud and for obtaining money, caused a bank check to be delivered by mail and commercial delivery service to the Southern District of Alabama.

In violation of Title 18, United States Code, Section 1341 and 2.

COUNT FIVE

From or about January 15, 2010 through on or about January 15, 2011, in the Southern District of Alabama, Southern Division, and elsewhere, the defendant,

TONYA RENEE COLLIER

did knowingly and with intent to defraud, obtain and use an unauthorized access device, which was obtained with the intent to defraud, more specifically GCCF claim number 1036867, such access device was the means by which the defendant accessed her claim for lost wages in the wake of the Deepwater Horizon incident and by such conduct did obtain items of value aggregating more than \$1,000.00 which acts did affect interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(2).

COUNT SIX

From on or about January 15, 2010 to on or about January 15, 2011, in the Southern District of Alabama, Southern Division, and elsewhere, the defendant,

TONYA RENEE COLLIER

willfully and knowingly devised and intended to devise a scheme and artifice to defraud The Deepwater Horizon Oil Spill Trust, and for obtaining money from The Deepwater Horizon Oil Spill Trust by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice to defraud and for obtaining money, caused a bank check to be delivered by mail and commercial delivery service to the Southern District of Alabama.

In violation of Title 18, United States Code, Section 1341 and 2.

COUNT SEVEN

On or about November 5, 2010, in the Southern District of Alabama, Southern Division, and elsewhere, the defendant,

WAYNE ERIC COLLIER, JR.

did knowingly and with intent to defraud, obtain and use an unauthorized access device, which was obtained with the intent to defraud, more specifically GCCF claim number 1134324, such access device was the means by which the defendant accessed his claim for lost wages in the wake of the Deepwater Horizon incident and by such conduct did obtain items of value aggregating more than \$1,000.00 which acts did affect interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(2).

COUNT EIGHT

On or about November 5, 2010, in the Southern District of Alabama, Southern Division, and elsewhere, the defendant,

WAYNE ERIC COLLIER, JR.

willfully and knowingly devised and intended to devise a scheme and artifice to defraud The Deepwater Horizon Oil Spill Trust, and for obtaining money from The Deepwater Horizon Oil Spill Trust by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice to defraud and for obtaining money, caused a bank check to be delivered by mail and commercial delivery service to the Southern District of Alabama.

In violation of Title 18, United States Code, Section 1341 and 2.

COUNT NINE

From or about June 1, 2010 through on or about December 30, 2011, in the Southern District of Alabama, Southern Division, and elsewhere, the defendant,

MICHAEL THOMAS STEINER

did knowingly and with intent to defraud, obtain and use an unauthorized access device, which was obtained with the intent to defraud, more specifically GCCF claim number 3111922, such access device was the means by which the defendant accessed his claim for lost wages in the wake of the Deepwater Horizon incident and by such conduct did obtain items of value aggregating more than \$1,000.00 which acts did affect interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(2).

COUNT TEN

From on or about June 1, 2010 to on or about December 30, 2011, in the Southern District of Alabama, Southern Division, and elsewhere, the defendant,

MICHAEL THOMAS STEINER

willfully and knowingly devised and intended to devise a scheme and artifice to defraud The Deepwater Horizon Oil Spill Trust, and for obtaining money from The Deepwater Horizon Oil Spill Trust by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice to defraud and for obtaining money, caused a bank check to be delivered by mail and commercial delivery service to the Southern District of Alabama.

In violation of Title 18, United States Code, Section 1341 and 2.

COUNT ELEVEN

From or about August 3, 2010 through on or about August 3, 2011, in the Southern District of Alabama, Southern Division, and elsewhere, the defendant,

SIMON JONATHAN WILLIAMS

did knowingly and with intent to defraud, obtain and use an unauthorized access device, which was obtained with the intent to defraud, more specifically GCCF claim number 1124652, such access device was the means by which the defendant accessed his claim for lost wages in the wake of the Deepwater Horizon incident and by such conduct did obtain items of value aggregating more than \$1,000.00 which acts did affect interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(2).

COUNT TWELVE

From on or about August 2, 2010 to on or about August 3, 2011, in the Southern District of Alabama, Southern Division, and elsewhere, the defendant,

SIMON JONATHAN WILLIAMS

willfully and knowingly devised and intended to devise a scheme and artifice to defraud The Deepwater Horizon Oil Spill Trust, and for obtaining money from The Deepwater Horizon Oil Spill Trust by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice to defraud and for obtaining money, caused a bank check to be delivered by mail and commercial delivery service to the Southern District of Alabama.

In violation of Title 18, United States Code, Section 1341 and 2.

COUNT THIRTEEN

On or about October 31, 2011, in the Southern District of Alabama, Southern Division, and elsewhere, the defendant,

BOBBY W. RODGERS

did knowingly and with intent to defraud, obtain and use an unauthorized access device, which was obtained with the intent to defraud, more specifically GCCF claim number 1631123, such access device was the means by which the defendant accessed his claim for lost wages in the wake of the Deepwater Horizon incident and by such conduct did obtain items of value aggregating more than \$1,000.00 which acts did affect interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(2).

COUNT FOURTEEN

On or about October 31, 2011, in the Southern District of Alabama, Southern Division, and elsewhere, the defendant,

BOBBY W. RODGERS

willfully and knowingly devised and intended to devise a scheme and artifice to defraud The Deepwater Horizon Oil Spill Trust, and for obtaining money from The Deepwater Horizon Oil Spill Trust by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice to defraud and for obtaining money, caused a bank check to be delivered by mail and commercial delivery service to the Southern District of Alabama.

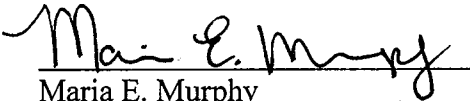
In violation of Title 18, United States Code, Section 1341 and 2.

A TRUE BILL

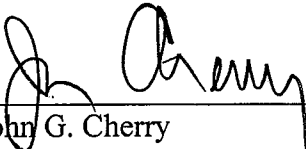


FOREMAN, UNITED STATES GRAND JURY
SOUTHERN DISTRICT OF ALABAMA

KENYEN R. BROWN
UNITED STATES ATTORNEY
by:



Maria E. Murphy
Assistant United States Attorney



John G. Cherry
Assistant United States Attorney
Chief, Criminal Division

SEPTEMBER 2013